

REMARKS

This application contains claims 1-48. Claims 16, 32 and 48 have been canceled without prejudice. Claims 1, 17 and 33 are hereby amended. No new matter has been introduced. Reconsideration is respectfully requested.

Applicant thanks Examiners Rampuria and Khatri for the courtesy of a personal interview with Applicant's representative, Daniel Kligler (Reg. No. 41,120), held in the USPTO on September 27. At the interview, Applicant's representative explained the distinction of the present invention over the cited art (Cheng et al., U.S. Patent Application Publication 2002/0010908; and Adams et al., U.S. Patent Application Publication 2005/0078611). It was agreed that the combined limitations of claims 1 and 16 would distinguish the invention over the cited art.

Independent claims 1, 17 and 33 were rejected under 35 U.S.C. 102(e) over Cheng (cited above). Applicant has amended these claims, as agreed in the interview, in order to clarify the distinction of the present invention over Cheng. The amended independent claims incorporate the limitations of claims 16, 32 and 48, now canceled, with clarification of the claim language as suggested by Examiner Khatri.

Amended claim 1 recites a method for producing embedded software, which comprises providing one or more generic application handler programs comprising code for performing generic application functions. Specific application handler code is generated in order to associate the generic application functions with specific functions of a device driver for a hardware module. The generic programs and specific code are compiled together for execution by an embedded processor in the hardware module. The claim has been amended to state that in generating the specific application handler code, a specific element of the specific application handler code is defined for handling by one of the generic application

functions, and a specific function of the device driver is registered for use in handling this specific element.

In other words, creating the specific application handler code involves making dual associations:

(1) associating one or more specific elements of the specific application handler code with corresponding generic application functions in the generic program; and

(2) registering a specific function of the hardware module device driver for handling each specific element of the specific application handler code.

This novel approach is advantageous in reducing the amount of work that the software developer must do for each new card and enhancing the maintainability of embedded software. It permits changes to be made in both generic application functions and specific card features without rewriting and debugging the entire application handler package (page 6, lines 8-16).

Cheng describes a system and method for automatic software code generation. The system generates software code for a handler function for handling user commands that are input via a command line interface (CLI) (paragraph [0018]). Cheng does not distinguish, however, between generic application handler programs and specific application handler code. It is therefore not surprising that Cheng fails to teach the step of compiling generic application handler programs together with specific application handler code, as recited in claim 1. Cheng also makes no mention of device drivers or associating generic application functions with specific functions of a device driver. Therefore, Cheng cannot be taken to suggest the step of registering specific device driver functions with specific elements of the application handler code as recited in amended claim 1.

In rejecting claim 16, the Examiner cited Adams, who makes reference (in paragraph [0384]) to "registering a

transition" with a "state distributor." The state distributor is "a communication mechanism for simultaneously informing multiple processes of changes in the states of various aspects of a system" (paragraph [0382]). Registering a transition causes the state distributor to inform the client process of certain types of events in Adams' call processing system (paragraphs [0378], [0384]). It has nothing to do with registering specific device driver functions with specific elements of the application handler code, as is recited in amended claim 1. The common use of the term "register" in Adams and in claim 16 was coincidental.

Thus, as agreed in the interview, claim 1, as amended, is believed to be patentable over the cited art. Independent claims 17 and 33 respectively recite a hardware module and a computer software product, which operate on principles similar to the method of claim 1. Claims 17 and 31 have been amended in like fashion to claim 1 and are thus believed to be patentable, as well, for the reasons stated above.

Claims 2-15, 18-31, 34 and 36-47 were rejected under 35 U.S.C. 103(a) over Cheng in view of Sun.com ("Solstice™ Telecommunications Management"). No grounds of rejection were listed with respect to claim 35. In view of the patentability of the amended independent claims, dependent claims 2-15, 28-31 and 34-47 are also believed to be patentable.

Claims 16, 32 and 48 were rejected under 35 U.S.C. 103(a) over Cheng in view of Adams. Applicant respectfully traverses this rejection for the reasons stated above with regard to amended claim 1. In view of the cancellation of claims 16, 32 and 48, however, this rejection is now moot.

Applicant has studied the additional references made of record by the Examiner and believes all the claims in the present patent application to be patentable over

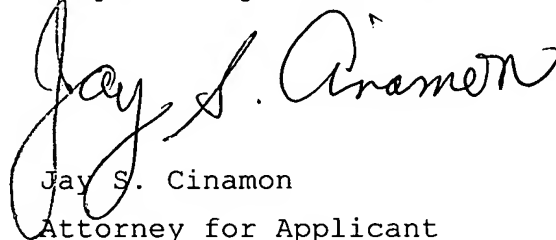
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these references, whether taken individually or in any combination.

Applicant believes the amendments and remarks presented hereinabove to be fully responsive to all of the grounds of rejection raised by the Examiner. In view of these amendments and remarks, Applicant respectfully submits that all of the claims in the present application are in order for allowance. Notice to this effect is hereby requested.

Please charge any fees which may be due, and which have not been submitted herewith to our Deposit Account No. 01-0035.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Jay S. Cinamon". The signature is fluid and cursive, with the first name "Jay" being particularly prominent.

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